

Eric A. Liepins
ERIC A. LIEPINS, P.C.
12770 Coit Road
Suite 1100
Dallas, Texas 75251
Ph. (972) 991-5591
Fax (972) 991-5788

PROPOSED ATTORNEY FOR DEBTOR

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

| | | |
|------------------------|---|-------------------|
| IN RE | § | |
| | § | |
| EVEREADY SERVICES, INC | § | Case No. 20-30225 |
| | § | |
| | § | |
| DEBTOR | § | |

MOTION TO CONVERT TO CHAPTER 7

NO HEARING WILL BE CONDUCTED ON THIS MOTION UNLESS A WRITTEN OBJECTION OR REQUEST FOR HEARING IS FILED WITH THE UNITED STATES BANKRUPTCY CLERK, 1100 COMMERCE STREET, 12TH FLOOR DALLAS, TEXAS 75242, WITHIN TWENTY-ONE (21) DAYS FROM THE DATE OF THE FILING OF THIS MOTION, UNLESS THE COURT, SUA SPONTE, OR UPON TIMELY APPLICATION OF A PARTY IN INTEREST, SHORTENS OR EXTENDS THE TIME FOR FILING SUCH OBJECTION OR REQUEST FOR HEARING.

IF NO OBJECTION OR REQUEST FOR HEARING IS TIMELY FILED, THE MOTION SHALL BE DEEMED TO BE UNOPPOSED AND THE COURT MAY ENTER AN ORDER GRANTING THE RELIEF SOUGHT. THE COURT RESERVES THE RIGHT TO SET ANY MATTER FOR HEARING.

TO THE HONORABLE UNITED STATES BANKRUPTCY JUDGE:

COMES NOW, Eveready Services, Inc, (“Debtor”) and moves the Court under 11

U.S.C. §1112 to Convert to Chapter 7 and would show the Court the following:

1. The Debtor filed a voluntary Chapter 11 Petition on January 23, 2020.

2. The Debtor owed a moving and storage facilities mainly to the interior design industry.
3. The Debtor sold its assets pursuant to Court order on May 4, 2020.
4. Debtor distributed the sales proceeds pursuant to Court order entered August 17, 2020.
5. Debtor has no further operations.
6. Debtor requests the Court to enter an Order converting the case to a Chapter 7 proceeding.

WHEREFORE, PREMISES CONSIDERED, the Debtor would request this matter be set down for hearing and that upon hearing, this Court enter and Order converting the case to a Chapter 7 proceeding, and for such other and further relief as the Debtor may show itself justly entitled.

Respectfully submitted,

Eric A. Liepins
Eric A. Liepins, P.C.
12770 Coit Road
Suite 1100
Dallas, Texas 75251
(972) 991-5591
(972) 991-5788 - telecopier

By: /s/ Eric Liepins
Eric A. Liepins, SBN 12338110

PROPOSED ATTORNEY FOR DEBTOR

Certificate of Service

I hereby certify that a true and correct copy of the foregoing Motion was to all creditors on the 25th day of August 2020.

_____/s/ Eric Liepins_____
Eric A. Liepins